

REMARKS

By this amendment, claims 1, 6, 8, , and 14 have been amended, and claim claim 13 has been cancelled. Claims 1-2 and 14-26 are pending in the application. Applicant reserves the right to pursue the original claims and other claims in this and other applications.

Claims 1, 6, 8, and 14 have been amended. No new matter has been added.

Claims 1-3, 6-10, 14-17, 20-23, and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. (EP-1050991) in view of Ahvenainen (US 6,199,161). This rejection is respectfully traversed. In order to establish a *prima facie* case of obviousness "the prior art reference (or references when combined) must teach or suggest all the claim limitations." M.P.E.P. §2142. Moreover, there must be some motivation present for the proposed combination of references. Neither Roche et al. nor Ahvenainen, even when considered in combination, teach or suggest all limitations of independent claims 1, 8, 15, 17, or 20, and there is no motivation to combine the references.

Claim 1 recites, *inter alia*, a method of updating an encryption key used by a wireless station for encrypted communications with a wired portion of the network, said method comprising "physically separating a communication device containing an encryption key used in said encrypted communications from said wireless station; physically connecting said removed communications device to an encryption key updating device which is connected to a wired portion of said network said wired portion of said network containing an encryption key generator for providing a new encryption key to said updating device; replacing an existing encryption key in said communications device with a new encryption key from said generator sent over said

wired portion of said network; and physically reconnecting said communications device containing said new encryption key with said wireless station of said network.”

Roche discloses “a dynamic validation system for high speed data processing with encryption.” (Roche, para. [0001]) The invention of Roche is directed towards a hard-wired network system, and not does disclose or suggest a wireless system. (see, for example, “The host 1 is connected through a public switch communications network 2, which would be generally connected by an ISDN line to an external adaptor 3 forming part of the telecommunications network 2 which in turn forms part of a terminal.” Roche, para. [0041]) Roche does have removable cards, but the cards are removably solely to replace slower processing circuits with faster processing circuits. The removable cards are not used to updated an encryption key by removing the cards from a wireless station and physically connecting them to an encryption key updating device of the wired network.

As such, Roche fails to disclose or suggest “physically separating ... from said wireless station; physically connecting ... to a wired portion of said network...; replacing an existing encryption key ... ; and physically reconnecting said communications device containing said new encryption key with said wireless station of said network.”

As noted in the Office Action, “Roche does not explicitly disclose physically separating and connecting a communication device and a wired and wireless network.” (office action, Page 3, ln. 15-16.)

Ahvenainen discloses a “method and mobile communication system for managing authentication keys, the system having at least one authentication center, base stations and mobile stations to which subscriber identity modules may be coupled

and which communication with the base stations.” (Ahvenainen, Abstract)

Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system, and it is thereafter used in internal computing in the authentication center and the subscriber identity module, such as a SIM card.” (Ahvenainen, Col. 7, ln. 10-15).

Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to be known by the mobile communication system and stored permanently in its database.” (Ahvenainen, Col. 8, ln. 63-65).

The SIM card of Ahvenainen is a “subscriber identity module...a smart card which is placed in the mobile equipment and which contains information, e.g., an authentication key K, required for identifying a subscriber and for encrypting radio traffic.” (Ahvenainen, Col. 2, lines 21-32). A removable card is used so that a user can easily use any mobile phone of a communication system by allowing the user to “move” his personal identification information from one phone to another, and is therefore not tied to a single phone in the communication system. (Ahvenainen, Col. 2, ln. 33-48).

Although the SIM card of Ahvenainen is removable, there is no discussion in Ahvenainen that the SIM card is removable to have the authentication updated and replaced into the mobile communication device. Ahvenainen does not teach “physically separating a communication device containing an encryption key from a wireless station of said network system,” “replacing an existing encryption key in said communications device with a new encryption key from said generator using a communication over said wired portion of said network system” and then “physically reconnecting said communications device containing said new encryption key with wireless station of said network system.” The invention of Ahvenainen teaches a SIM card that used to authenticate a user of a mobile communication device (e.g., a cell

phone). Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest, either separately or in combination, all of the limitations of claim 1, claim 1 is not obvious over the cited references.

Additionally, as Roche deals with updating encryption system in a hardwired system, and Ahvenainen deals with authorizing cell phone use with a non-changeable authentication key, there is no inherent ability to combine the two references. The two systems are entirely different and are directed solving completely different problems. Roche is wired network system while Ahvenainen relates to authenticating cell phone using of a non-updatable code. There is clearly no motivation in the references to combine their desperate teachings together.

Claim 8 recites, *inter alia*, a wireless network comprising "a wired station connected to a wired network, said wired station comprising: an encryption key generator for generating an encryption key; a network communications device for transmitting said encryption key over said wired network; and a wired encryption key updating device connected to said wired network; a wireless station wirelessly connected to said network and communicating with said wired network through communications encrypted with an encryption key, said wireless station comprising: a wireless network communications device containing an encryption key, said wireless network communications device being physically disconnectable from said wireless station and physically connectable to an updating device wired to said network to receive and store as a new encryption key, an encryption key transmitted over said wired network by said wired network communications device."

As discussed above regarding the patentability of claim 1, neither Roche nor Ahvenainen teach or suggest these limitations. Roche fails to suggest or disclose "said wireless network communications device being physically disconnectable from said

wireless station and physically connectable to said wired updating device wired to receive and store as a new encryption key, an encryption key transmitted over said wired network by said wired network communications device.”

As noted in the Office Action, “Roche does not explicitly disclose a wireless network communications device being physically disconnectable from said wireless station and physically connectable to said wired network to receive and store as a new encryption key.” (Office Action, Page 5, ln. 16-18.)

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” (Ahvenainen, Col. 7, ln. 10-13). Thus, Ahvenainen does not remedy the deficiency of Roche et al.

Since Roche and Ahvenainen, neither separately or in combination, as noted above, do not teach or suggest all of the limitations of claim 8, claim 8 is not obvious over the cited references. Additionally, as Roche deals with updating encryption system in a hardwired system, and Ahvenainen deals with authorizing cell phone use with a non-changeable authentication key, there is no inherent ability to combine the two references. The two systems are entirely different and are directed solving completely different problems. Roche is wired network system while Ahvenainen relates to authenticating cell phone use. There is clearly no motivation in the references to combine their desperate teachings together.

Claim 15 recites a wireless network wireless station comprising, *inter alia*, “a wireless network communications device for conducting wireless communications with a wired network, said wireless network communications device being physically removable from said station and storing an updateable encryption key used in

conducting encrypted wireless communications, said removable wireless network communications device being physically connectable to a wired network to receive and store a new encryption key."

As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, "Roche does not explicitly disclose a wireless network communications device being physically disconnectable from said wireless station and physically connectable to said wired network to receive and store as a new encryption key." Nor does Ahvenainen teach or suggest these limitations. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 15, claim 15 is not obvious over the cited references.

Claim 17 recites a wireless network communications device comprising, *inter alia*, "a removable wireless communications network card adapted to be physically connected to and disconnected from a wireless station card interface; a storage area on said network card which stores an updateable encryption key for use in conducting encrypted wireless network communications, said encryption key being updateable when said card is physically connected to a wired network card interface which supplies a new encryption key."

As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, "Roche does not explicitly disclose a removable wireless communications network card adapted to be physically connected to a wireless station card interface." Page 7, ln. 18-19.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 17, claim 17 is not obvious over the cited references.

Claim 20, as amended, recites an encryption key programming system comprising, *inter alia*, “an encryption key generator connected to a wired network; and a programming device connected to said wired network for receiving over a wire connection an encryption key from said generator, said programming device being adapted to physically receive a wireless network communications device containing an updatable encryption key and storing said received encryption key in said wireless network communications device”

As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, “Roche does not explicitly disclose adapted to physically receive a wireless network communication device.” Page 8, ln. 17-18.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 20, claim 20 is not obvious over the cited references.

Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claims 1, 8, 15, 17, and 20, claims 1, 8, 15, 17, and 20 are not obvious over the cited references. Claims 2-3 and 6-7 depend from claim 1 and are patentable at least for the reasons mentioned above. Claims 9-10 and 14 depend from claim 8 and are patentable at least for the reasons mentioned above. Claim 16 depends from claim 15 and is patentable at least for the reasons mentioned above. Claims 21-23 and 26 depend from claim 20 and are patentable at least for the reasons mentioned above. Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claims 1-3, 6-10, 14-17, 20-23, and 26 be withdrawn.

Claims 4-5, 11-12, and 24-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. in view of Ahvenainen, and further in view of Trieger (US 6,226,750). This rejection is respectfully traversed. Claims 4-5 depend from claim 1 and are patentable at least for the reasons mentioned above. Claims 11-12 depend from claim 8 and are patentable at least for the reasons mentioned above. Claims 24-25 depend from claim 20 and are patentable at least for the reasons mentioned above. Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of claims 4-5, 11-12, and 24-25 be withdrawn.

Claims 18-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. in view of Ahvenainen, and further in view of Serecki et al. (US 2003/0078072). This rejection is respectfully traversed. Claims 18-19 depend from claim 17 and are patentable at least for the reasons mentioned above. Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of claims 18-19 be withdrawn.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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